

# **EXHIBIT 1**

NOTICE OF SUIT TO SHERIFF OF ALLEGHENY CO.

You are hereby notified that on 05/20/2025

a COMPLAINT has been filed in this case

and you are required to serve the same on or before the

08/18/2025

Michael McGeever, Director

Department of Court Records

**COMPLAINT IN CIVIL ACTION**

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA**

Plaintiff(s)

**Friend, Lawrence**

Case Number:

**GD-25-005390**

Type of pleading:

**Complaint**

Filed on behalf of:

**Friend Lawrence**

**Cordes J Samuel**

(Name of filing party)

VS

Defendant(s)

**Ansco & Associates,**

☒ Counsel of Record

☐ Individual, If Pro Se

Name, Address and Telephone Number:

**Cordes J Samuel**

**Quatrini Law Group**

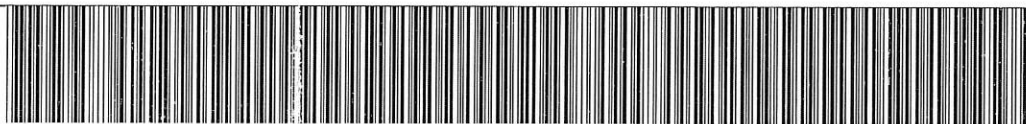
**941 Penn Avenue**

**Pittsburgh, PA, 15222**

**412 5194663**

**412 4718500**

Attorney's State ID: **54874**



**Michael McGeever, Director**  
**Department of Court Records**

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
CIVIL DIVISION**

**COVER SHEET**

Plaintiff(s) Vs LAWRENCE FRIEND	
Vs.  Defendant(s) ANSCO & ASSOCIATES	Case Number :
	Type of pleading : Complaint in Civil Action
	Filed on behalf of LAWRENCE FRIEND, Plaintiff
	(Name of the filing party)
	<input checked="checked" type="checkbox"/> Counsel of Record Samuel J. Cordes, Attorney <input type="checkbox"/> Individual, If Pro Se
	Address, Telephone Number, and Email Address: Quatrini Law Group 941 Penn Avenue Pittsburgh, PA 15222 (412) 519-4663 sjc@qrlegal.com
	Attorney's State ID 54874
	Attorney's Firm ID

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

LAWRENCE FRIEND,

NO.

Plaintiff,

**JURY TRIAL DEMANDED**

v.

DATE FILED:

ANSCO & ASSOCIATES,

Defendant.

TYPE OF PLEADING:  
**Complaint in Civil Action**

FILED ON BEHALF OF:  
Plaintiff

**CERTIFICATE OF COMPLIANCE**

I verify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

COUNSEL OF RECORD FOR  
THIS PARTY:

Samuel J. Cordes, Attorney  
PA I.D. No. 54874

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Pittsburgh, PA 15222  
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\_\_\_\_\_  
Samuel J. Cordes, Attorney  
*Attorney for Plaintiff*

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

LAWRENCE FRIEND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	NO.
ANSCO & ASSOCIATES, LLC,	)	
	)	
Defendant.	)	

**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claim set forth against you. You are warned that if you fail to do so the case may proceed without you and judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERRAL SERVICE  
ALLEGHENY COUNTY BAR ASSOCIATION  
Koppers Building, Suite 400  
4365 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 261-0518

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

LAWRENCE FRIEND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	NO.
ANSCO & ASSOCIATES, LLC,	)	
	)	
Defendant.	)	

**COMPLAINT IN CIVIL ACTION**

Plaintiff, Lawrence Friend, by undersigned counsel, files the following Civil Complaint and in support alleges the following:

**I. PARTIES**

1. Lawrence Friend (“Friend”) is an individual residing at 821 Sleepy Hollow Road, Apartment M, Pittsburgh, Pennsylvania 15234.

2. Ansco & Associates, LLC, (“Defendant”) is a Georgia domestic limited liability corporation authorized to do business in Pennsylvania with its headquarters located at 1220 Old Alpharetta Road, Suite 380, Alpharetta, GA 30005.

3. Defendant is an employer within the meaning of the Pennsylvania Medical Marijuana Act, 35 Pa. Cons. Stat. Ann. §10231.2101 (“MMA”).

**II. FACTUAL BACKGROUND**

4. Friend began working at Black & Veatch Holding Company in 2012 in the warehouse. In 2014, Friend was promoted to warehouse coordinator.

5. Black & Veatch is an engineering, procurement, consulting and construction company.



6. Throughout his employment, Friend was responsible for unloading incoming freight, organizing materials to be shipped out, and loading contractor's vehicles. At all times relevant, Friend performed his job duties in a manner fully acceptable to his employer.

7. In 2019, Friend was diagnosed with Sciatica. His sciatica causes significant back pain and trouble sleeping.

8. In 2023, Friend began using medical marijuana to cope with his Sciatica pain. At this time he became an individual certified to use medical marijuana.

9. During the period Friend worked for Black & Veatch he informed his safety manager of his status as an individual who is certified to use medical marijuana.

10. In 2024, Defendant acquired Black & Veatch and all of the employee records relevant thereto. Upon the acquisition, Defendant chose to keep several Black and Veatch employees, including Friend on its staff.

11. As part of the acquisition, employees were required to go through initial background checks including a drug test.

12. Defendant's drug and alcohol policy is outlined in its employee handbook which states the following:

"In the interest of safety and wellbeing of all its employees, the company is committed to providing a working environment free from the use of alcohol and unlawful drugs. When people use alcohol or drugs on the job or come to work under the influence of alcohol or drugs, they pose a danger to themselves and others. Substance abuse interferes with the user's job performance and leads to absenteeism, tardiness, and a poor work product. It can also result in injuries and damage to company property. The company has, therefore, adopted a drug and alcohol-free workplace policy, applicable to all company job applicants and employees unless superseded by local law."



13. Friend subsequently failed Defendant's test because of his status as an individual certified to use medical marijuana.

14. Immediately thereafter, consistent with the information in his employment file, Friend informed Defendant that he was an individual certified to use medical marijuana and presented his valid Pennsylvania Medical Marijuana Card.

15. Despite Friend informing Defendant of his status as an individual certified to use medical marijuana, Defendant rescinded the job offer it made to Friend.

16. When Friend asked for a reason as to why his offer was rescinded, Defendant claimed that it was due to his positive drug test.

**COUNT I: VIOLATION OF THE MMA**

17. Friend incorporates by reference the averments in paragraphs 1 through 16 as if fully set in full.

18. Defendant refused to hire and/or fired Friend and otherwise discriminated against Friend in his terms, conditions and privileges of employment solely because of his status as an individual certified to use medical marijuana in violation of 35 Pa. Cons. Stat. §. 10231.2103(b)(1).

19. Defendant's violation of Section 1031.2103(b)(1) was taken intentionally and made with reckless indifference to Friend's right to be considered for employment irrespective of his status as an individual certified to use medical marijuana and therefore punitive damages should be assessed to punish and deter such misconduct.

20. As a direct and proximate result of Defendant's violation of the above statute, Friend has suffered lost wages, benefits, and pain and suffering in an amount to be proven at trial.

WHEREFORE, Plaintiff, Lawrence Friend, demands judgment against Defendant, and compensatory and punitive damages in an amount exceeding \$50,000.

**COUNT II: WRONGFUL DISCHARGE IN CONTRAVENTION OF PENNSYLVANIA  
PUBLIC POLICY**

21. Friend incorporates by reference the allegations in paragraph 1 through 20 as if fully restated herein.

22. Defendant failed to hire and or discharged Friend from his position because he was and is certified to use medical marijuana.

23. Defendant's failing to hire and/or discharging Friend was undertaken intentionally and/or with reckless indifference to his rights under the public policy of Pennsylvania not to be refused employment and/or discharged for a reason that contravenes the public policy incorporated in the Medical Marijuana law.

24. As a direct and proximate result of Defendant's failure to hire and/or discharge of Kemper, he suffered lost wages in an amount exceeding \$50,000 as well as other economic benefits of his employment with Defendant, in addition to suffering extreme emotional distress and like conditions.

WHEREFORE, Plaintiff, Lawrence Friend, demands judgment against Defendant in an amount exceeding \$50,000, including the following:

- a. Reinstatement to his position including all benefits and seniority rights;
- b. Payment of back wages and benefits from the date of discharge;
- c. Compensatory and punitive damages in an amount to be proven at trial;
- d. Any actual damages incurred by Friend; and
- e. Any other remedy the Court finds to be just.

**JURY TRIAL DEMANDED**

Respectfully submitted,

Quatrini Law Group

By: 

Samuel J. Cordes, Attorney  
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(412) 519-4663  
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Pittsburgh, PA 15222  
[sjc@qrlegal.com](mailto:sjc@qrlegal.com)

**VERIFICATION**

I, Lawrence Friend, verify that the statements made in the foregoing **COMPLAINT IN CIVIL ACTION** are true and correct to the best of my knowledge, information, and belief.

This statement and Verification is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

05/16/2025

Date



Lawrence Friend

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by Samuel J. Cordes

Signature: \_\_\_\_\_

Samuel J. Cordes

Attorney No. 54874